

EXHIBIT 4

CONFIDENTIAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LACI N. BLANCHARD, *
INDIVIDUALLY, AND AS NEXT*
FRIEND OF W.B., SURVIVING*
MINOR CHILD OF RONNIE P. *
BLANCHARD, JR., *
*
PLAINTIFF, * CIVIL ACTION NO.
* 22-CV-2420
VS. *
*
SANARE ENERGY PARTNERS *
LLC, ET AL., *
*
DEFENDANTS. *

* * * CONFIDENTIAL * * *

ORAL AND VIDEOTAPED DEPOSITION OF
MICHAEL BRENT GRANGER
INDIVIDUALLY
AND AS DESIGNATED CORPORATE REPRESENTATIVE
ON BEHALF OF
SANARE ENERGY PARTNERS, LLC
PURSUANT TO FRCP 30(b)(6)
JANUARY 28, 2025

ORAL AND VIDEOTAPED DEPOSITION OF MICHAEL
BRENT GRANGER, produced as a witness at the
instance of the PLAINTIFF(S), and duly sworn, was
taken in the above-styled and numbered cause on
JANUARY 28, 2025, from 9:13 A.M. to 5:23 P.M.,
before AMY PRIGMORE, CSR, in and for the State of

CONFIDENTIAL

1 Texas, reported by stenographic means, at the
2 offices of Williams Tower Conference Center,
3 2800 Post Oak Boulevard, Level 2 – Beacon Boardroom
4 Houston, Texas, pursuant to the Federal Rules of
5 Civil Procedure and the provisions stated on the
6 record or attached hereto.

CONFIDENTIAL

A P P E A R A N C E S

FOR THE PLAINTIFF(S):

Roland Christensen
Joe Drennan (VIA ZOOM)
ARNOLD & ITKIN LLP
6009 Memorial Dr
Houston TX 77007
rchristensen@arnolditkin.com
888-493-1629

FOR THE DEFENDANT(S), SANARE ENERGY PARTNERS, LLC:

M. Matt Jett
Caroline Bossier (VIA ZOOM)
HALL MAINES LUGRIN PC
2800 Post Oak Blvd Ste 6400
Houston TX 77056
mjett@hallmaineslugrin.com
713-871-9000

Robert R. Johnston (VIA ZOOM)
PUSATERI JOHNSTON GUILLOT & GREENBAUM, LLC
1100 Poydras Street Suite 2250
New Orleans LA 70163
robert.johnston@pjgglaw.com
504-620-2013

FOR THE DEFENDANT(S), SBS ENERGY SERVICES:

Henry H. LeBas (VIA ZOOM)
LEBAS LAW OFFICE
2 Flagg Place, Suite 1
Lafayette LA 70503
hlebas@lebaslaw.com
337-236-5500

FOR THE DEFENDANT(S), HARDY OILFIELD SERVICES:

David Barfield (VIA ZOOM)
MARON MARVEL BRADLEY ANDERSON & TARDY, LLC
1020 Highland Colony Pkwy Ste 400
Ridgeland MS 39157
DBarfield@maronmarvel.com

CONFIDENTIAL

1 FOR THE DEFENDANT(S), WARRIOR AND SUPERIOR:
Ross A. Darville
2 BRADLEY ARANT BOULT CUMMINGS, LLP
600 Travis St JPMorgan Chase Tower Ste 5600
3 Houston TX 77002
rdarville@bradley.com

4
5 FOR THE DEFENDANT(S), ALL COAST:
6 Matthew Moeller
THE MOELLER FIRM
7 650 Poydras St, Ste 1207
New Orleans LA 70130
8 matthew@moellerfirm.com

9
10 FOR THE DEFENDANT(S), NPC LAND & MARINE, LLC:
Shannon Ramirez (VIA ZOOM)
11 Kimberly A. Fojtik (VIA ZOOM)
LABORDE SIEGEL LLC
12 5151 San Felipe, Suite 750
Houston TX 77056
13 sramirez@labordesiegel.com
kfojtik@labordesiegel.com

14
15 ALSO PRESENT:
16 Cody Hall, Videographer
Troy Hirschhorn, Videographer
17 Robert Bray
18
19
20
21
22
23
24
25

CONFIDENTIAL

1	INDEX		
2			PAGE
3	APPEARANCES		3
	STIPULATIONS		1
4	SIGNATURE AND CHANGES		340
	REPORTER'S CERTIFICATE.....		342
5			
6	E X A M I N A T I O N S		
7	MICHAEL BRENT GRANGER		PAGE
	EXAMINATION		7
8	BY MR. CHRISTENSEN		
	EXAMINATION		219
9	BY MR. LEBAS		
	EXAMINATION		310
10	BY MR. MOELLER		
	EXAMINATION		316
11	BY MR. DARVILLE		
	REEXAMINATION		326
12	BY MR. CHRISTENSEN		
	EXAMINATION		331
13	BY MR. BARFIELD		
14			
15	E X H I B I T S		
	EXHIBIT	DESCRIPTION	PAGE
16	EXHIBIT 81	PHOTOGRAPH	81
	EXHIBIT 82	PHOTOGRAPH	81
17	EXHIBIT 83	PHOTOGRAPH	81
	EXHIBIT 84	SCHEMATIC	81
18	EXHIBIT 85	PHOTOGRAPH	81
	EXHIBIT 86	PHOTOGRAPH	81
19	EXHIBIT 87	PHOTOGRAPH	81
	EXHIBIT 88	PHOTOGRAPH	81
20	EXHIBIT 89	SCHEMATIC	81
	EXHIBIT 90	PHOTOGRAPH	81
21	EXHIBIT 91	FIGURE 12	81
	EXHIBIT 92	PHOTOGRAPH	81
22	EXHIBIT 93	TEXT MESSAGES	132
	EXHIBIT 94	E-MAIL	134
23	EXHIBIT 95	HARDY OILFIELD SERVICES	138
		PROPOSAL, BATES LABEL	
24		SANARE 645	
25			

CONFIDENTIAL

1	EXHIBIT 96	HARDY OILFIELD SERVICES PRESENTATION, BEGINNING	147
2		BATES LABEL SANARE 612	
3	EXHIBIT 97	EXHIBIT A TO THE FOLEY SUBPOENA RESPONSE	164
4	EXHIBIT 98	EXHIBIT B TO THE FOLEY SUBPOENA RESPONSE	164
5	EXHIBIT 99	INCIDENT INVESTIGATION, BEGINNING BATES LABEL SANARE 263	174
6	EXHIBIT 100	INCIDENT INVESTIGATION PROCEDURE, BEGINNING	174
7		BATES LABEL SANARE 2330	
8	EXHIBIT 101	E-MAIL, BEGINNING BATES LABEL SANARE 3772	176
9	EXHIBIT 102	INCIDENT INVESTIGATION REPORT, BEGINNING BATES LABEL SANARE 2426	176
10	EXHIBIT 103	INCIDENT INVESTIGATION REPORT, BEGINNING BATES LABEL SANARE 2421	177
11	EXHIBIT 104	EXCEL CHART	177
12		INVESTIGATION FORM	
13	EXHIBIT 105	EXCEL CHART	177
14	EXHIBIT 106	EXCEL CHART	177
15	EXHIBIT 107	INVESTIGATIVE DOCUMENTS, BEGINNING SANARE BATES NUMBER 4806	177
16	EXHIBIT 108	LEVEL 1 INSPECTION REPORT. BEGINNING BATES LABEL SANARE 403	203
17	EXHIBIT 109	PHOTOGRAPH	303

CONFIDENTIAL

1 Q. And did you see that from the crew, as well,
2 that when you interviewed them, that they were
3 hoping he would be able to get himself disconnected
4 and make it to the surface?

5 A. That's -- everyone on the -- everyone that
6 was on the crew and that was involved in the
7 project felt that way.

8 Q. Right. So every single person who had
9 witnessed this topple over were hoping and praying
10 that Ronnie would be able to get himself
11 disconnected and be able to swim back up, right?

12 A. Yes, sir.

13 Q. And no one you talked to at all had said
14 that Ronnie, you know, had been killed or crushed
15 or anything like that before he went in the water.
16 You didn't hear any evidence of that, correct?

17 A. No, sir.

18 Q. All right. The evidence was all, he went in
19 the water alive, and they were hoping he could make
20 it out?

21 A. Yes, sir.

22 Q. Okay. And unfortunately, that -- he wasn't
23 able to get it disconnected, correct?

24 A. That's correct.

25 Q. From your investigation, from Sanare's side,

CONFIDENTIAL

1 unit crew member attached to the top of the jack
2 assembly by a safety harness and lanyard.

3 Do you see that?

4 A. Yes, sir.

5 Q. And it looks like that's the -- kind of that
6 window that we talked about that some people said
7 it started tipping as fast as 30 seconds up to 2
8 minutes. And that's noted right there, correct?

9 A. Yes, sir.

10 Q. Now, here, on the next paragraph, it says:
11 Crew members on the Swordfish rang the general
12 alarm to muster all personnel to aid in looking for
13 the crew member that was on the hydraulic workover
14 unit assembly to retrieve him from the Gulf of
15 Mexico in the event he was able to disconnect his
16 lanyard and swim to the surface.

17 Do you see that?

18 A. Yes, sir.

19 Q. And this is the part that it sounds like
20 from all the witness statements, witnesses saw
21 Mr. Blanchard fall into the water while he was
22 still connected to the hydraulic workover unit.

23 Is that correct?

24 A. Yes, sir.

25 Q. And so, it wasn't that the witnesses were

CONFIDENTIAL

1 concerned that he had already passed away. Their
2 hope was he's down there, pinned in the water, and
3 hopefully he can disconnect himself and get out,
4 correct?

5 A. Yes, sir.

6 Q. Okay. Down here, where it says: Sanare
7 management was notified of the incident
8 approximately 840 hours.

9 And this is where you were talking about
10 your involvement with me, that Brent Granger
11 contacted Mr. Anthony Pizza with BSEE New Orleans
12 District at 915.

13 Do you see that?

14 A. Yes, sir.

15 Q. So is that -- after you found out about it
16 shortly after, then you then call the BSEE
17 representative to let them know.

18 A. Yes, sir.

19 Q. And in those initial calls, I -- I assume at
20 that point, you still don't know a whole lot of
21 what's happened, right?

22 A. No, sir, I do not.

23 Q. Okay. It reads down here: The hydraulic
24 workover unit crew member that was on the unit at
25 the time the unit fell over never surfaced. Sanare